## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

MASSACHUSETTS EXECUTIVE OFFICE OF THE TRIAL COURT,

Plaintiff,

Civil Case No. 25-10769-WGY

v.

AGENT BRIAN SULLIVAN,

Defendant.

## BRIAN SULLIVAN'S MOTION TO VACATE

Brian Sullivan, by and through his undersigned counsel, respectfully moves this Court to vacate the April 1, 2025 order of contempt entered against him by the Boston Municipal Court, Central Division, for the reasons further described in the accompanying memorandum of law.

WHEREFORE, Brian Sullivan respectfully requests that the Court allow this motion and vacate the order of contempt entered by the Boston Municipal Court.

Respectfully submitted,

LEAH B. FOLEY United States Attorney

Dated: April 2, 2025 By: /s/ Michael L. Fitzgerald

RAYFORD A. FARQUHAR MARK SAUTER MICHAEL L. FITZGERALD Assistant United States Attorneys U.S. Attorney's Office 1 Courthouse Way, Ste. 9200

Boston, MA 02210 (617) 748-3100

rayford.farquhar@usdoj.gov mark.sauter@usdoj.gov

michael.fitzgerald2@usdoj.gov

## **LOCAL RULE 7.1 CERTIFICATION**

I certify that I have not conferred with counsel for the opposing party, as counsel has not appeared for the opposing party to date.

/s/ Michael L. Fitzgerald MICHAEL L. FITZGERALD Assistant U.S. Attorney

## **CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the following parties:

Counsel for the Commonwealth of
Massachusetts
Maria Romero
Assistant District Attorneys
Suffolk County District Attorney's Office
One Bulfinch Place
Boston, MA 02114

Counsel for Wilson Martell-LeBron Murat Erkan Ryan Sullivan Erkan and Sullivan, P.C. 300 High Street Andover, MA 01810

/s/ Michael L. Fitzgerald MICHAEL L. FITZGERALD Assistant U.S. Attorney

Dated: April 2, 2025